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Attorneys for Defendant
WILLIAMS LEA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JUDE DELGADO,

Plaintiff,

VS.

WILLIAMS LEA, INC., CHARLOTTE
DOLLY, and DOES 1 through 100,
inclusive.

Defendants.

No. C07-3526 JSW

**STIPULATION REGARDING
ALTERNATIVE DISPUTE RESOLUTION
AND CASE MANAGEMENT
CONFERENCE AND [PROPOSED] ORDER**

Date: October 19, 2007
Time: 1:30 p.m.
Place: Crtm. 2, 17th Floor
Before: Hon. Jeffrey S. White

The parties, by and through their respective counsel of record, hereby stipulate and agree as follows and respectfully request that the Court approve and give effect to their stipulation:

WHEREAS, on October 12, 2007, the parties participated in an ADR Conference Call, pursuant to Local Rule 16-8(c);

WHEREAS, during the ADR conference call, the parties agreed to participate in this Court's mediation program, pursuant to ADR Local Rule 6;

WHEREAS, on July 22, 2007, plaintiff filed a motion to remand this action to San Francisco County Superior Court, which this Court took under submission on August 16, 2007;

WHEREAS, the parties believe there is a greater likelihood of settlement if they participate in a mediation prior to the issuance of this Court's order on plaintiff's motion to remand;

WHEREAS, a case management conference is currently scheduled for October 19, 2007;

WHEREAS, counsel for plaintiff is scheduled to be in trial in another action, styled
Sylvia Reynoso v. State of California Department of Transportation, Sacramento Superior Court,
Case No. 05AS03030, on October 19, 2007;

IT IS HEREBY STIPULATED AND AGREED that:

1. The parties request referral to the Court's mediation program, pursuant to ADR Local Rule 6;

2. The parties request that the Court continue the Case Management Conference by one week, to October 26, 2007, or as soon thereafter as is convenient for this Court;

3. The parties request that the Court hold plaintiff's motion to remand in abeyance pending the parties' participation in a mediation pursuant to ADR Local Rule 6.

IT IS SO STIPULATED.

Dated: October ___, 2007

Respectfully submitted,

LAW OFFICES OF MICHAEL HOFFMAN

By _____
MICHAEL HOFFMAN

Attorneys for Plaintiff
JUDE DELGADO

1 Dated: October ___, 2007

SONNENSCHEIN NATH & ROSENTHAL LLP

4 By _____
5 SONIA MARTIN

6 Attorneys for Defendants
7 WILLIAMS LEA, INC., CHARLOTTE DOLLY

8 IT IS SO ORDERED.

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10 Dated: _____, 2007

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12 _____ The Hon. Jeffrey S. White

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